

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 1634, 1645

**DEBTORS' OMNIBUS OBJECTION TO AND RESERVATION OF RIGHTS
REGARDING MOTIONS FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIMS**

Big Lots, Inc. and certain of its affiliates (collectively, the “**Debtors**” or “**Big Lots**”), each of which is a debtor and debtor in possession in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), file this omnibus objection and reservation of rights (this “**Objection**”) to the (a) *Home Meridian International’s Motion for Allowance and Payment of Administrative Expense Claim* [D.I. 1634] (the “**Home Meridian Motion**”) filed by Home Meridian International (“**Home Meridian**”) and (b) *Motion of Standard Fiber, LLC for Allowance and Compelling Immediate Payment of Administrative Expense Claim* [D.I. 1645] (the “**Standard Fiber Motion**”) and, together with the Home Meridian Motion, the “**Motions**”) filed by Standard Fiber, LLC (“**Standard Fiber**” and, together with Home Meridian, the “**Movants**”). In support of this Objection, the Debtors respectfully state as follows:

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Objection

1. On January 14, 2025, the Debtors filed the *Debtors' Omnibus Objection to Motions for Allowance and Payment of Stub Rent, Post-Petition Rent, and Other Administrative Expense Claims* [D.I. 1705] (the “**First Omnibus Objection**”),² which requested, *inter alia*, that this Court deny without prejudice all motions to compel payment of administrative expense claims filed by certain Trade Movants and Landlord Movants. *See generally* First Omnibus Obj. In the alternative, the First Omnibus Objection requested that the Court hold all such motions in abeyance “until the Debtors have a reasonable opportunity to work with the Committee and other parties in interest to establish an orderly process for reconciling administrative expense claims, including the establishment of an administrative claims bar date.” *Id.* ¶ 6.

2. As this Court noted at the January 21, 2025 omnibus hearing, “it isn’t a prudent use of time or expense engaging in ad hoc litigation of claims” for each potential administrative expense claim asserted via motion in these Chapter 11 Cases, including the claims asserted by Movants. *See* Jan. 21 Hr’g Audio File [D.I. 1805] at 00:38:30–00:38:49. The Court likewise encouraged the Debtors’ ongoing efforts to establish an orderly and equitable administrative claims reconciliation process in consultation with the Committee. *Id.* at 00:38:49–00:39:05.

3. The Debtors incorporate by reference all arguments made in the First Omnibus Objection as though fully set forth herein. The Debtors therefore respectfully request that the Court deny the Motions without prejudice or, in the alternative, hold the Motions in abeyance pending the Debtors’ establishment of an orderly and equitable claims reconciliation process, which the Debtors expect to present in the coming days via separate motion.

² Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the First Omnibus Objection.

Reservation of Rights

4. Notwithstanding anything to the contrary in this Objection or the First Omnibus Objection, the Debtors reserve their rights to contest the allegations raised in the Motions on any other grounds, including that the claims asserted by Movants are not entitled to administrative expense priority or do not accurately reflect the amount of the Debtors' actual liability, whether or not such grounds are raised in this Objection. Nothing contained herein should be deemed to constitute an admission regarding the validity or allowability of the claims asserted by the Movants or any other administrative expense claims asserted in these Chapter 11 Cases.

Conclusion

WHEREFORE, for the reasons set forth herein, the Debtors respectfully request that the Court (a) deny the Motions and (b) grant the Debtors such other and further relief as is just and proper including, in the alternative, holding the Motions in abeyance until the Debtors have established an administrative expense claims bar date and an orderly process for reconciling such claims in these Chapter 11 Cases.

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Dated: January 22, 2025
Wilmington, Delaware

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